

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS**

\_\_\_\_\_  
MAURA O’NEILL, as administrator of the Estate  
of Madelyn E. Linsenmeir,

Plaintiff,

v.

CITY OF SPRINGFIELD, *et al.*

Defendants.

C.A. No. 20-30036-MGM

**MOTION FOR LEAVE TO FILE UNDER SEAL**  
**PLAINTIFF’S OPPOSITION TO MOTIONS IN LIMINE AND ANNEXED EXHIBITS**

Pursuant to Local Rule 7.2 of the U.S. District Court for the District of Massachusetts, Plaintiff, Maura O’Neill, as administrator of the Estate of Madelyn E. Linsenmeir (the “Plaintiff”), respectfully moves for leave to file under seal Plaintiff’s Opposition to Motions in Limine (the “Opposition”) and the Exhibits annexed within.

As grounds, Plaintiff states that the Opposition and Exhibits contain information that Defendants for Hampden County Sheriff’s Department, Eileen Barrett, and Maureen Couture (collectively, “HCSD”) have designated as confidential under the stipulated protective order entered in this case (Docket No. 64).

If the Court orders the filing to be sealed, the filing should remain sealed until further order of the Court.

Dated: April 30, 2024

Respectfully submitted,

Plaintiff Estate of Madelyn Linsenmeir,

/s/ Kiman Kaur

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**LOCAL RULE 7.1 CERTIFICATE**

I hereby certify that counsel for plaintiff attempted to confer with counsel for HCSD by email and phone in a good-faith attempt to resolve or narrow the relief requested in this motion, but plaintiff's counsel has not yet heard back from counsel for HCSD.

/s/ Kiman Kaur

Dated: April 30, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that on April 30, 2024, the foregoing document was served on all counsel of record in the above-captioned matter through the Court's CM/ECF system.

Dated: April 30, 2024

/s/ Kiman Kaur